

TM:MSA  
F.#2012R00879

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

- against -

BENTLEY MARTIN,  
also known as "Killa" and  
"B,"

Defendant.

S U P E R S E D I N G  
I N F O R M A T I O N

Cr. No. 12-391 (S-4) (BMC)  
(T. 18, U.S.C.,  
§§ 924(c)(1)(A)(i),  
924(c)(1)(A)(ii),  
924(c)(1)(A)(iii), 2 and  
3551 et seq.; T. 21, U.S.C.,  
§§ 841(b)(1)(A)(i),  
841(b)(1)(A)(iii), 846,  
853(a) and 853(p))

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THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE  
(Narcotics Distribution Conspiracy)

1. On or about and between January 1, 2001 and May 22, 2012, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant BENTLEY MARTIN, also known as "Killa" and "B," together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute one or more controlled substances, which offense involved (i) one kilogram or more of a substance containing heroin, a Schedule I controlled substance, and (ii) 280 grams or more of a substance containing cocaine base, a

Schedule II controlled substance, contrary to Title 21, United States Code, Section 841(a)(1).

(Title 21, United States Code, Sections 846, 841(b)(1)(A)(i) and 841(b)(1)(A)(iii); Title 18, United States Code, Sections 3551 et seq.)

COUNT TWO  
(Use of Firearm)

2. On or about and between January 1, 2001 and September 12, 2006, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant BENTLEY MARTIN, also known as "Killa" and "B," together with others, did knowingly and intentionally use and carry one or more firearms during and in relation to a drug trafficking crime, to wit: the crime charged in Count One, and did knowingly and intentionally possess said firearms in furtherance of such drug trafficking crime, which firearms were brandished and discharged.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), 924(c)(1)(A)(ii), 924(c)(1)(A)(iii), 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION  
AS TO COUNT ONE

3. The United States hereby gives notice to the defendant that, upon conviction of the offense charged in Count One, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853(a), which requires any person

convicted of such offense to forfeit any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such offense, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offense.

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the court;

(d) has been substantially diminished in value;

or

(e) has been commingled with other property which cannot be divided without difficulty;

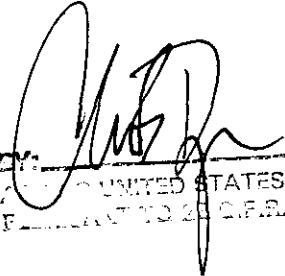
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any

other property of the defendant up to the value of the  
forfeitable property described in this forfeiture allegation.

(Title 21, United States Code, Sections 853(a) and  
853(p))

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LORETTA E. LYNCH  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK



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UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK  
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